

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

*THIS DOCUMENT RELATES TO:
ALL CASES*

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**McKESSON'S MOTION TO COMPEL PRODUCTION OF
THE OHIO AUTOMATED Rx REPORTING SYSTEM DATABASE**

McKesson Corporation ("McKesson"), by its undersigned counsel of record, respectfully moves the Court pursuant to Rule 45(d)(2)(B)(i) of the Federal Rules of Civil Procedure for an order compelling the State of Ohio Board of Pharmacy ("the Board") to produce the Ohio Automated Rx Reporting System ("OARRS") database for the following reasons:

1. The OARRS database is necessary to understand the full extent of the opioid crisis, and the public interest in this litigation weighs in favor of production.
2. Defendants require the data to perform independent analyses, including expert analyses, necessary to defend against Plaintiffs' claims.
3. The Board's objections are inadequate to excuse its production obligations.

The reasons for granting this motion are more fully set forth in the attached memorandum in support. At the direction of Special Master Cohen, this motion is being filed on the public docket, but is directed in the first instance to him.

Date: December 31, 2018

Respectfully submitted,

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